

REMARKS**I. INTRODUCTION**

Claims 1, 9, 18, 22-24, 26 and 28-32 have been amended. Claims 11 and 33-36 have been cancelled. Claims 9, 18, 22-24, 26 and 28-32 are amended for non-statutory reasons: to correct one or more informalities, remove figure label number(s), and/or to replace European-style claim phraseology with American-style claim language. No new matter has been added. Thus, claims 1-10 and 12-32 are pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

II. THE DRAWING OBJECTION SHOULD BE WITHDRAWN

Figure 1 is being objected to because text labels are necessary for the Applicants' drawing to be understood. (See 08/19/08 Office Action, p. 2). Applicants respectfully traverse this rejection because the figures are properly labeled with reference numerals and the specification provides a proper description for each of these reference numerals. However, in order to expedite prosecution, an updated version of Figure 1, including labels, has been submitted with this Amendment. Thus, Applicants respectfully submit that the drawing objection should be withdrawn.

III. THE FORMATTING OBJECTION SHOULD BE WITHDRAWN

The disclosure stands objected to by the Examiner due to the specification not being properly arranged or labeled. (See 08/19/08 Office Action, p. 3). Applicants respectfully traverse this objection. Section headings are merely permissible and not mandatory (See 37 CFR 1.77(b); MPEP 608.01(a)). Furthermore, the Patent Office stated that it will not require any application to comply with the format set forth in 37 C.F.R. 1.77. (See *Miscellaneous Changes in Patent Practice*, Response to comments 17 and 18 (Official Gazette, September 18, 1996).

Accordingly, Applicants respectfully submit that this objection to the specification should be withdrawn.

IV. THE CLAIM OBJECTIONS SHOULD BE WITHDRAWN

Claim 1 stands objected to by the Examiner as being written in the two-part European style, including a “characterizing” clause. (See 08/19/08 Office Action, p. 3). Claim 1 has been amended, thus, Applicants submit that the claim is now allowable and the objection should be withdrawn.

V. THE 35 U.S.C. § 112 REJECTIONS SHOULD BE WITHDRAWN

Claims 29-32 stand rejected under 35 U.S.C. § 112 as being indefinite or for failing to particularly point out the claimed subject matter which the Applicants regard as the invention. (See 08/19/08 Office Action p. 3-4). Claims 29-32 have been amended, thus, Applicants submit that the claims are now allowable and the 35 U.S.C. § 112 rejection should be withdrawn.

VI. THE 35 U.S.C. § 101 REJECTIONS SHOULD BE WITHDRAWN

Claims 33-36 stand rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. (See 08/19/08 Office Action p. 4-5). Claims 33-36 have been cancelled, thus, Applicants submit that the 35 U.S.C. § 101 rejection should be withdrawn.

VII. THE 35 U.S.C. § 102(b) REJECTIONS SHOULD BE WITHDRAWN

Claims 1-2, 5-9, 12-19, 22-26, and 29-36 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Saito et al. “Privacy Enhanced Access Control by SPKI” (hereinafter “Saito”). (See 08/19/08 Office Action, p. 5-9).

Claim 1 has been amended to recite, “A method of associating data with users involving associations between user identifying information and data, comprising: concealing a user identity using concealing data in the user identifying information, *wherein the concealing data remains fixed for reissued associations*, such that it is possible to check for a given user identity whether the association applies to it.” The Examiner asserts that the recitation of claim 1 is disclosed in Saito at pages 301-303. (See 08/19/08 Office Action p. 5-6). Applicants respectfully disagree.

Saito describes a privacy enhanced service scheme using SPKI certificates. (See Saito Abstract). Saito’s method uses three different certificates to protect user identifying information in electronic communications. (See Saito p. 301, section I). The first is an ID Certificate, which contains the user identifying information and public key. (See Saito p. 301, section I). The second is an Attribute Certificate, which contains the user identifying information and an authorization. (See Saito p. 301, section I). This authorization is defined as the access rights to a server. (See Saito p. 303, section II B.1). The third certificate is an Authorization Certificate, which contains the authorization and the public key. (See Saito p. 301, section I). Saito specifically uses this Authorization Certificate to control access, because it does not contain any user identifying information. (See Saito p. 301, section I). In this way, the public key acts as the concealing data in the Saito system. When the public key is created, it is based on the individual authority with which the user connects. (See Saito p. 303, section II B.2). This public key is created based on the server, not the user identifying information. (See Saito p. 303, section II B.2). The public key created by Saito is regarded as disposable, and does not contain the user’s identifying information. (See Saito p. 302, section II B, and p. 303, section II B.2).

In contrast, claim 1 recites, “wherein the concealing data remains fixed for reissued associations.” As described above, the concealing data of Saito (i.e. the public key) is not fixed. Thus, Applicants respectfully submit that claim 1 is patentable over Saito. Because claims 2, 5-9, and 12-19 depend from, and therefore include all the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 1.

Independent claim 22 has been amended to recite, “Method of giving a user access to information in relation to an association between a user and data including the steps of: receiving from a user a request concerning said data using user identifying information related to the user, (steps 42; 50; 60; 98; 84), retrieving the association including user identifying information that has been concealed using concealing data, *wherein the concealing data remains fixed for reissued associations* (steps 43; 53; 77; 85; 99), checking the concealed user identifying information in the association, (steps 44; 54; 78; 90; 104), and providing the user with information related to the data, (steps 46; 56; 80; 92; 108) based on a correspondence between the concealed user identifying information in the association and user identifying information at least linked to the user.”

Applicants respectfully submit that claim 22 is allowable for at least the same reasons given above with respect to claim 1. Because claims 23-26 depend from, and therefore include all the limitations of claim 22, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 22.

Independent claim 29 has been amended to recite, “A computer readable storage medium (112) for hiding the identity of a user in an association between said user and data, including a set of instructions executable by a processor, the set of instructions being operable to: conceal user identifying information using concealing data for provision of the concealed user identifying information in the association, *wherein the concealing data remains fixed for reissued associations.*”

Applicants respectfully submit that claim 29 is allowable for at least the same reasons given above with respect to claim 1.

Independent claim 30 has been amended to recite, “A computer readable storage medium (20, 22, 24) for giving a user access to information in relation to an association between a user and data, including a set of instructions executable by a processor, the set of instructions being operable to: receive a request from a user concerning said data including user identifying information relating to the user, retrieve an association between the data and a user including

user identifying information, which has been concealed using concealing data, *wherein the concealing data remains fixed for reissued associations*, check the concealed user identifying information in the association, and provide the user with information related to the data based on a correspondence between the concealed user identifying information in the association and user identifying information at least linked to the user.”

Applicants respectfully submit that claim 30 is allowable for at least the same reasons given above with respect to claim 1.

Independent claim 31 has been amended to recite, “A computer readable storage medium (20, 22, 24) for obtaining information in relation to an association between a user and said data, including a set of instructions executable by a processor, the set of instructions being operable to: receive user identifying information related to a user that has been concealed using concealing data, and send a request concerning said data including the concealed user identifying information, *wherein the concealing data remains fixed for reissued associations*, so that an association between the user and said data comprising the concealed user identifying information can be received.”

Applicants respectfully submit that claim 31 is allowable for at least the same reasons given above with respect to claim 1.

Independent claim 32 has been amended to recite, “A computer readable storage medium (26) for providing information in relation to data while concealing the identity of at least one user in relation to an association between the user and said data, including a set of instructions executable by a processor, the set of instructions being operable to: receive a request concerning said data including the user identifying information which has been concealed using concealing data, *wherein the concealing data remains fixed for reissued associations*, and provide an association between the user and said data comprising the concealed user identifying information.”

Applicants respectfully submit that claim 32 is allowable for at least the same reasons given above with respect to claim 1.

VIII. THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN

Claims 3-4, 10-11, 20-21, and 27-28 stand rejected under 35 U.S.C. § 103(a) as being anticipated by Saito in view of U.S. Patent Application No. 11/308,798 to Alldredge. (hereinafter "Alldredge"). (See 08/19/08 Office Action, p. 9-11). Applicant respectfully submits that claims 1 and 22 are patentable over Saito either alone or in combination with Alldredge. Thus, because claims 3-4, 10-11, 20-21, and 27-28 depend from, and therefore include all the limitations of claims 1 and 22 respectively, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claims 1 and 22.

CONCLUSION

In light of the foregoing, Applicants respectfully submit that all of the now pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

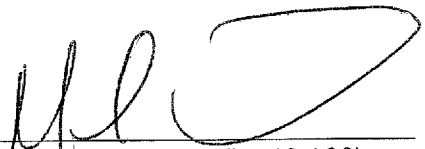
Please direct all correspondence in this application to:

Kevin C. Ecker (Reg. No. 43,600)
Senior IP Counsel

Philips Intellectual Property & Standards.
P.O. Box 3001, Briarcliff Manor, NY 10510-8001 USA.
Phone: +1 (914) 333-9618.
Fax: +1 (914) 332-0615.
E-mail: kevin.ecker@philips.com

Respectfully submitted,

Dated: November 18, 2008

By: 
Michael Marcin (Reg. No. 48,198)

Fay Kaplun & Marcin, LLP
150 Broadway, Suite 702
New York, NY 10038
Phone: 212-619-6000
Fax: 212-619-0276